

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA  
BRUNSWICK DIVISION

U.S. DIST. CT COURT  
BRUNSWICK DIV.  
2018 DEC -7 PM 3:02

UNITED STATES OF AMERICA ) SUPERSEDING INDICTMENT NO. 18-10001 GA.  
 ) 2:18CR50  
v. )  
 ) VIOLATIONS:  
ROBERT CURTIS JOHNSON, )  
a/k/a "Jay," ) 21 U.S.C. § 846  
ANDREW RILEY, ) Conspiracy to Possess with Intent  
a/k/a "Drew," ) to Distribute and to Distribute  
a/k/a "Twin," ) Controlled Substances  
a/k/a "Riley RI," )  
ANTHONY KANYATTA SEALS, ) 21 U.S.C. § 841(a)(1)  
a/k/a "Yatta," ) Possession with Intent to  
MICHAEL ARTHUR NIXON, ) Distribute Controlled Substances  
a/k/a "Mike," )  
a/k/a "Sweat," ) 18 U.S.C. § 922(g)  
MARIO CAPERS, ) Possession of a Firearm by a  
a/k/a "Twin," ) Prohibited Person  
a/k/a "Twin 1," )  
JOSE SALGUERO, ) 18 U.S.C. § 924(c)  
a/k/a "Gualla," ) Possession of a Firearm in  
JERMAINE TYRONE FULLER, ) Furtherance of a Drug Trafficking  
a/k/a "Jack," ) Offense  
DERRICK BERNARD JOHNSON, )  
a/k/a "Rick," ) 18 U.S.C. § 2  
ALEX DION MANOR, ) Aiding and Abetting  
a/k/a "Sly," )  
JIMMY BRADWELL FERRELL, ) FORFEITURE ALLEGATION  
MALIK WILLIAMS, )  
a/k/a "Zoo," )  
a/k/a "Lil Zoo," )  
a/k/a "Hurk," )  
REGINALD ANDRE BECKHAM, )  
a/k/a "Reggie B," )  
JAMAL DAVID GAINES, )  
a/k/a "Juvy," )  
ELLIOT LOYRANZY )  
ARMSTRONG, )  
TIMOTHY JOHN SALLINS, )  
a/k/a "Tim," )  
JOHN DRAXELL BUCKLEY, )

a/k/a "Johnathan," )  
CAMRON THOMAS, )  
a/k/a "DeDe," and )  
EBONI GRANT )

**THE GRAND JURY CHARGES THAT:**

**COUNT ONE**

*CONSPIRACY TO POSSESS WITH INTENT TO DISTRIBUTE AND TO DISTRIBUTE  
CONTROLLED SUBSTANCES  
21 U.S.C. § 846*

Beginning on a date unknown to the Grand Jury, but as early as October 2017, up to and including the return date of this indictment, the precise dates being unknown, in Glynn County and surrounding counties, within the Southern District of Georgia, and elsewhere, the defendants herein:

**ROBERT CURTIS JOHNSON,**  
a/k/a "Jay,"  
**ANDREW RILEY,**  
a/k/a "Drew,"  
a/k/a "Twin,"  
a/k/a "Riley RI,"  
**ANTHONY KANYATTA SEALS,**  
a/k/a "Yatta,"  
**MICHAEL ARTHUR NIXON,**  
a/k/a "Mike,"  
a/k/a "Sweat,"  
**MARIO CAPERS,**  
a/k/a "Twin,"  
a/k/a "Twin 1,"  
**JOSE SALGUERO,**  
a/k/a "Gualla,"  
**JERMAINE TYRONE FULLER,**  
a/k/a "Jack,"  
**DERRICK BERNARD JOHNSON,**  
a/k/a "Rick,"  
**ALEX DION MANOR,**  
a/k/a "Sly,"  
**JIMMY BRADWELL FERRELL,**

**MALIK WILLIAMS,  
a/k/a "Zoo,"  
a/k/a "Lil Zoo,"  
a/k/a "Hurk,"  
REGINALD ANDRE BECKHAM,  
a/k/a "Reggie B,"  
JAMAL DAVID GAINES,  
a/k/a "Juvy,"  
ELLIOT LOYRANZY ARMSTRONG,  
TIMOTHY JOHN SALLINS,  
a/k/a "Tim,"  
JOHN DRAXELL BUCKLEY,  
a/k/a "Johnathan,"  
CAMRON THOMAS,  
a/k/a "DeDe,"  
EBONI GRANT**

aided and abetted by each other and by others known and unknown, did knowingly and intentionally combine, conspire, confederate and agree together and with each other, and with others known and unknown, to possess with intent to distribute a mixture or substance containing detectable amounts of cocaine, a Schedule II controlled substance, a mixture or substance containing detectable amounts of cocaine base, ("crack-cocaine"), a Schedule II controlled substance, a mixture or substance containing detectable amounts marijuana, a Schedule I controlled substance, and a mixture or substance containing detectable amounts of MDMA (methylenedioxymethamphetamine), a Schedule I controlled substance, and a mixture or substance containing detectable amounts of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C), and (b)(1)(D).

All done in violation of Title 18, United States Code, Section 2 and Title 21, United States Code, Section 846.



**TYPE AND QUANTITY OF CONTROLLED SUBSTANCES OF THE  
CONSPIRACY**

With respect to:

**ANDREW RILEY,  
a/k/a “Drew,”  
a/k/a “Twin,”  
a/k/a “Riley RI,”  
ANTHONY KANYATTA SEALS,  
a/k/a “Yatta,”  
JERMAINE TYRONE FULLER,  
a/k/a “Jack,”  
ROBERT CURTIS JOHNSON,  
a/k/a “Jay,”  
MICHAEL ARTHUR NIXON,  
a/k/a “Mike,”  
a/k/a “Sweat,”**

as a result of their own conduct, respectively, and the conduct of conspirators, it was reasonably foreseeable to each of those defendants individually that this conspiracy involved 280 grams or more of cocaine base (“crack cocaine”), a Schedule II controlled substance, 50 grams or more of methamphetamine, a Schedule II controlled substance, and 5 kilograms or more of cocaine, a Schedule II controlled substance.

All done in violation of Title 18, United States Code, Section 2 and Title 21, United States Code, Sections 841(a)(1), (b)(1)(B) and 846.

With respect to,

**TIMOTHY JOHN SALLINS,  
a/k/a “Tim,”  
MARIO CAPERS,  
a/k/a “Twin,”  
a/k/a “Twin 1,”**

as a result of their own conduct, respectively, and the conduct of conspirators, it was reasonably foreseeable to each of those defendants individually that this conspiracy

involved 5 grams or more of methamphetamine, a Schedule II controlled substance, and 500 grams or more of cocaine, a Schedule II controlled substance.

All done in violation of Title 18, United States Code, Section 2 and Title 21, United States Code, Sections 841(a)(1), (b)(1)(B) and 846.

**COUNT TWO**

*POSSESSION WITH INTENT TO DISTRIBUTE CONTROLLED SUBSTANCES*  
21 U.S.C. § 841

On or about January 19, 2018, in Glynn County, within the Southern District of Georgia, the defendant,

**ANDREW RILEY,  
a/k/a “Drew,”  
a/k/a “Twin,”  
a/k/a “Riley RI,”**

did knowingly and intentionally possess with intent to distribute a substance or mixture containing a detectable amount of cocaine base, (“crack-cocaine”), a Schedule II controlled substance.

All done in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT THREE**

*POSSESSION WITH INTENT TO DISTRIBUTE CONTROLLED SUBSTANCES*  
21 U.S.C. § 841

On or about January 23, 2018, in Glynn County, within the Southern District of Georgia, the defendant,

**ANDREW RILEY,  
a/k/a “Drew,”  
a/k/a “Twin,”  
a/k/a “Riley RI,”**

did knowingly and intentionally possess with intent to distribute a substance or mixture containing a detectable amount of cocaine base, (“crack-cocaine”)

All done in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT FOUR**

*POSSESSION WITH INTENT TO DISTRIBUTE CONTROLLED SUBSTANCES*  
21 U.S.C. § 841

On or about February 6, 2018, in Glynn County, within the Southern District of Georgia, the defendant,

**ANDREW RILEY,  
a/k/a “Drew,”  
a/k/a “Twin,”  
a/k/a “Riley RI,”**

did knowingly and intentionally possess with intent to distribute a substance or mixture containing a detectable amount of cocaine base, (“crack-cocaine”), a Schedule II controlled substance.

All done in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT FIVE**

*POSSESSION WITH INTENT TO DISTRIBUTE CONTROLLED SUBSTANCES*  
21 U.S.C. § 841

On or about February 26, 2018, in Glynn County, within the Southern District of Georgia, the defendants,

**ANDREW RILEY,**  
a/k/a “Drew,”  
a/k/a “Twin,”  
a/k/a “Riley RI,”  
**ANTHONY KANYATTA SEALS,**  
a/k/a “Yatta,”

aided and abetted by each other, did knowingly and intentionally possess with intent to distribute a substance or mixture containing a detectable amount of cocaine base, (“crack-cocaine”), a Schedule II controlled substance.

All done in violation of Title 18, United States Code, Section 2 and Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT SIX**

*POSSESSION WITH INTENT TO DISTRIBUTE CONTROLLED SUBSTANCES*  
21 U.S.C. § 841

On or about March 2, 2018, in Glynn County, within the Southern District of Georgia, the defendants,

**ANDREW RILEY,**  
a/k/a “Drew,”  
a/k/a “Twin,”  
a/k/a “Riley RI,”  
**ANTHONY KANYATTA SEALS,**  
a/k/a “Yatta,”



aided and abetted by each other, did knowingly and intentionally possess with intent to distribute a substance or mixture containing a detectable amount of cocaine base, (“crack-cocaine”), a Schedule II controlled substance.

All done in violation of Title 18, United States Code, Section 2 and Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT SEVEN**

*POSSESSION WITH INTENT TO DISTRIBUTE CONTROLLED SUBSTANCES*  
21 U.S.C. § 841

On or about March 21, 2018, in Glynn County, within the Southern District of Georgia, the defendants,

**ANDREW RILEY,**  
a/k/a “Drew,”  
a/k/a “Twin,”  
a/k/a “Riley RI,”  
**ANTHONY KANYATTA SEALS,**  
a/k/a “Yatta,”

aided and abetted by each other, did knowingly and intentionally possess with intent to distribute a substance or mixture containing a detectable amount of cocaine base, (“crack-cocaine”), a Schedule II controlled substance.

All done in violation of Title 18, United States Code, Section 2 and Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).



**COUNT EIGHT**

*POSSESSION OF A FIREARM BY A PROHIBITED PERSON*  
18 U.S.C. § 922(g)(1)

On or before February 27, 2015, in Ware County, within the Southern District of Georgia, the defendant,

**ANTHONY KANYATTA SEALS,**  
**a/k/a “Yatta,”**

having been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, a firearm: to wit: a silver Jennings, Model 25, .25mm pistol; said firearm having been shipped and transported in interstate commerce.

All done in violation of Title 18, United States Code, Section 922(g)(1).

**COUNT NINE**

*POSSESSION WITH INTENT TO DISTRIBUTE COCAINE*  
21 U.S.C. § 841

On or about February 27, 2015, in Glynn County, within the Southern District of Georgia, the defendant,

**ANTHONY KANYATTA SEALS,**  
**a/k/a “Yatta,”**

did knowingly and intentionally possess with intent to distribute a substance or mixture containing a detectable amount of cocaine, a Schedule II controlled substance.

All done in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT TEN**

*POSSESSION WITH INTENT TO DISTRIBUTE CONTROLLED SUBSTANCES*  
21 U.S.C. § 841

On or about June 14, 2018, in Glynn County, within the Southern District of Georgia, the defendant,

**MICHAEL ARTHUR NIXON,**  
**a/k/a “Mike,”**  
**a/k/a “Sweat,”**

did knowingly and intentionally possess with intent to distribute a mixture or substance containing detectable amounts of cocaine, a Schedule II controlled substance; and a mixture or substance containing detectable amounts of marijuana, a Schedule I controlled substance.

All done in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C),(b)(1)(D).

**COUNT ELEVEN**

*POSSESSION WITH INTENT TO DISTRIBUTE CONTROLLED SUBSTANCES*  
21 U.S.C. § 841

On or about February 20, 2018, in Glynn County, within the Southern District of Georgia, the defendant,

**MARIO ANDRE CAPERS,**  
**a/k/a “Twin,”**  
**a/k/a “Twin 1,”**

did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of N-Ethylpentylone, (“bath salts”), a Schedule I controlled substance.

All done in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT TWELVE**

*POSSESSION WITH INTENT TO DISTRIBUTE CONTROLLED SUBSTANCES*  
21 U.S.C. § 841

On or about February 14, 2018, in Glynn County, within the Southern District of Georgia, the defendant,

**JOSE ALBERTO SALGUERO,**  
**a/k/a “Guala,”**

did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of cocaine base, (“crack-cocaine”), a Schedule II controlled substance.

All done in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT THIRTEEN**

*POSSESSION WITH INTENT TO DISTRIBUTE CONTROLLED SUBSTANCES*  
21 U.S.C. § 841

On or about September 25, 2018, in Glynn County, within the Southern District of Georgia, the defendant,

**JERMAINE TYRONE FULLER,**  
**a/k/a “Jack,”**

did knowingly and intentionally possess with intent to distribute a mixture or substance containing 5 grams or more of methamphetamine, a Schedule II controlled substance.

All done in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT FOURTEEN**

*POSSESSION WITH INTENT TO DISTRIBUTE CONTROLLED SUBSTANCES*  
21 U.S.C. § 841

On or about July 19, 2018, in Glynn County, within the Southern District of Georgia, the defendant,

**ALEX DION MANOR,**  
**a/k/a “Sly,”**

did knowingly and intentionally possess with intent to distribute a mixture or substance containing detectable amounts of cocaine base, (“crack-cocaine”), a Schedule II controlled substance.

All done in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT FIFTEEN**

*POSSESSION WITH INTENT TO DISTRIBUTE CONTROLLED SUBSTANCES*  
21 U.S.C. § 841

On or about July 20, 2018, in Glynn County, within the Southern District of Georgia, the defendant,

**ALEX DION MANOR,**  
**a/k/a “Sly,”**

did knowingly and intentionally possess with intent to distribute a mixture or substance containing detectable amounts of cocaine base, (“crack-cocaine”), a Schedule II controlled substance.



All done in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT SIXTEEN**

*POSSESSION WITH INTENT TO DISTRIBUTE CONTROLLED SUBSTANCES*  
21 U.S.C. § 841

On or about August 8, 2018, in Glynn County, within the Southern District of Georgia, the defendant,

**REGINALD ANDRE BECKHAM,**  
**a/k/a “Reggie B,”**

did knowingly and intentionally possess with intent to distribute a mixture or substance containing detectable amounts of cocaine base, (“crack-cocaine”), a Schedule II controlled substance.

All done in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT SEVENTEEN**

*POSSESSION OF A FIREARM BY A PROHIBITED PERSON*  
18 U.S.C. § 922(g)(3)

On or about November 15, 2018, in Glynn County, within the Southern District of Georgia, the defendant,

**MALIK WILLIAMS,**  
**a/k/a “Zoo,”**  
**a/k/a “Lil Zoo,”**  
**a/k/a “Hurk,”**

who at that time was an unlawful user of a controlled substance, as defined in 21 U.S.C. Sec. 802, did knowingly possess, in and affecting interstate and foreign commerce, firearms: to wit: a DPMS rifle, Model 8-15, and a Glock, Model 21, .45

caliber pistol; said firearms having been shipped and transported in interstate commerce.

All done in violation of Title 18, United States Code, Section 922(g)(3).

**COUNT EIGHTEEN**

*POSSESSION OF A FIREARM BY A PROHIBITED PERSON*

18 U.S.C. § 922(g)(1)

On or before November 15, 2018 in McIntosh County, within the Southern District of Georgia, the defendant,

**TIMOTHY SALLINS,  
a/k/a “Tim”**

having been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, a firearm: to wit: a New England 12 gauge shotgun, Model Pardner; said firearm having been shipped and transported in interstate commerce.

All done in violation of Title 18, United States Code, Section 922(g)(1).

**COUNT NINETEEN**

*POSSESSION OF A FIREARM BY A PROHIBITED PERSON*

18 U.S.C. § 922(g)(1)

On or about November 15, 2018, in Glynn County, within the Southern District of Georgia, the defendant,

**ALEX DION MANOR,  
a/k/a “Sly,”**

having been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, firearms: to wit: a Highpoint, Model JHP, .45 caliber pistol, and a Keltec, Model P32,

.32 caliber pistol; said firearms having been shipped and transported in interstate commerce.

All done in violation of Title 18, United States Code, Section 922(g)(1).

**COUNT TWENTY**

*POSSESSION WITH INTENT TO DISTRIBUTE CONTROLLED SUBSTANCES*  
21 U.S.C. § 841

On or about November 15, 2018, in Glynn County, within the Southern District of Georgia, the defendants,

**ALEX DION MANOR,  
a/k/a “Sly,”  
EBONI GRANT**

aided and abetted by each other, did knowingly and intentionally possess with intent to distribute a substance or mixture containing a detectable amount of cocaine base, (“crack-cocaine”), a Schedule II controlled substance.

All done in violation of Title 18, United States Code, Section 2 and Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT TWENTY-ONE**

*Possession of a Firearm in Furtherance of Drug Trafficking*  
18 U.S.C. § 924(c)

On or about November 15, 2018, in Glynn County, within the Southern District of Georgia, the defendants,

**ALEX DION MANOR,  
a/k/a “Sly,”  
EBONI GRANT**

did knowingly possess firearms, to wit, a Highpoint, Model JHP, .45 caliber pistol, and a Keltec, Model P32, .32 caliber pistol, in furtherance of a drug trafficking crime

for which they may be prosecuted in a court of the United States, to wit, Conspiracy to Possess with Intent to Distribute Controlled Substances and to Distribute Controlled Substances, in violation of Title 21, United States Code, Section 846, as charged in Count 1 of this Indictment.

All done in violation of Title 18, United States Code, Section 924(c).

**COUNT TWENTY-TWO**  
*POSSESSION WITH INTENT TO DISTRIBUTE COCAINE*  
21 U.S.C. § 841

On or about November 14, 2018, in Glynn County, within the Southern District of Georgia, the defendant,

**ANTHONY KANYATTA SEALS,**  
**a/k/a “Yatta,”**

did knowingly and intentionally possess with intent to distribute a substance or mixture containing a detectable amount of cocaine, a Schedule II controlled substance.

All done in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).



**FORFEITURE ALLEGATION**

**(21 U.S.C. § 853, 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c))**

The allegations contained in Counts One through Twenty-Two of this Indictment is hereby incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853, Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

Upon conviction of any of the offenses set forth in this Indictment, Defendant

**ANTHONY KANYATTA SEALS,  
a/k/a "Yatta,"  
MALIK WILLIAMS,  
a/k/a "Zoo,"  
a/k/a "Lil Zoo,"  
a/k/a "Hurk,"  
TIMOTHY JOHN SALLINS,  
a/k/a "Tim,"  
ALEX DION MANOR,  
a/k/a "Sly,"  
EBONI GRANT**

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in the commission of the offense(s), including but not limited to:

- One silver Jennings, Model 25, .25mm pistol, bearing serial number 232911
- One DPMS rifle, Model 8-15, bearing serial number FFH146139
- One Glock, Model 21, .45 caliber pistol bearing serial number BNX919
- One New England 12 gauge shotgun, Model Pardner, bearing serial number NS200352

- One Highpoint, Model JHP, .45 caliber pistol, bearing serial number 4225462
- One Keltec, Model P32, .32 caliber pistol, bearing serial number 103645
- Assorted ammunition

Upon conviction of one or more of the offenses in violation of Title 21, United States Code set forth in this Indictment, Defendants

**ROBERT CURTIS JOHNSON,**  
a/k/a “Jay,”  
**ANDREW RILEY,**  
a/k/a “Drew,”  
a/k/a “Twin,”  
a/k/a “Riley RI,”  
**ANTHONY KANYATTA SEALS,**  
a/k/a “Yatta,”  
**MICHAEL ARTHUR NIXON,**  
a/k/a “Mike,”  
a/k/a “Sweat,”  
**MARIO CAPERS,**  
a/k/a “Twin,”  
a/k/a “Twin 1,”  
**JOSE SALGUERO,**  
a/k/a “Gualla,”  
**JERMAINE TYRONE FULLER,**  
a/k/a “Jack,”  
**DERRICK BERNARD JOHNSON,**  
a/k/a “Rick,”  
**ALEX DION MANOR,**  
a/k/a “Sly,”  
**JIMMY BRADWELL FERRELL,**  
**MALIK WILLIAMS,**  
a/k/a “Zoo,”  
a/k/a “Lil Zoo,”  
a/k/a “Hurk,”  
**REGINALD ANDRE BECKHAM,**  
a/k/a “Reggie B,”  
**JAMAL DAVID GAINES,**  
a/k/a “Juvy,”  
**ELLIOT LOYRANZY ARMSTRONG,**  
**TIMOTHY JOHN SALLINS,**

**a/k/a “Tim,”  
JOHN DRAXELL BUCKLEY,  
a/k/a “Johnathan,”**

shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense, including but not limited to:

- \$2,525.00 in U.S. Currency
- a silver Jennings, Model 25, .25mm pistol, bearing serial number 232911
- One silver Jennings, Model 25, .25mm pistol, bearing serial number 232911
- One DPMS rifle, Model 8-15, bearing serial number FFH146139
- One Glock, Model 21, .45 caliber pistol bearing serial number BNX919
- One New England 12 gauge shotgun, Model Pardner, bearing serial number NS200352
- One Highpoint, Model JHP, .45 caliber pistol, bearing serial number 4225462
- One Keltec, Model P32, .32 caliber pistol, bearing serial number 103645
- Assorted ammunition and firearm magazines

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;

- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).



David H. Estes  
First Assistant U.S. Attorney



Jennifer J. Kirkland  
Assistant United States Attorney  
(Lead Counsel)

for person



Brian T. Rafferty  
Assistant United States Attorney  
Chief, Criminal Division



Marcela C. Mateo  
Assistant United States Attorney  
(Co-Counsel)